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Rae Carole Armstrong,
Mayor



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February 23, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Federal-State Joint Board on Universal Service Lifeline and Link Up**
CC Docket No. 96-45; WC Docket 03-109

Dear Chairman Genachowski,

As you know, Federal-State Joint Board on Universal Service Lifeline and Link Up recently provided its recommendations to the FCC. We applaud the efforts by the Joint Board to address the issues concerning Lifeline and Link Up. As this country continues to rise from the worst economic recession since *The Great Depression*, Lifeline service -- especially free service -- is vital to low-income families survival to stay connected to their families, potential employers and above all, emergencies.

We agree with the Board's recommendation that the Commission should look for ways to adopt uniformity on areas such as verification procedures and sampling criteria that would apply to all Eligible Telecommunications Carriers (ETCs) in order to minimize waste, fraud and abuse. However, one area of concern is the discussion of capping low-income support. Historically, the low-income support of the fund has had a very low penetration rate and while cost has grown in the low-income support, it is still minimal compared to the area of High Cost. Likewise, it makes little sense to consider adding mandatory (even minimal) monthly subscriber fees for Lifeline users, which would present an undue administrative burden on both carriers and consumers. The best approach to curtailing fraud and abuse is establishment of an eligibility database.

In this context, we must consider that low-income support is cyclical. In times of economic strife, such as the one we are currently facing, it is logical for this area of support to increase. When the economy is prosperous, families are working and meeting their economic needs and therefore, support for the area would decrease.

We urge the Commission to consider these recommendations outlined in the report. However, the Commission should not adopt measures or practices that hinder the Lifeline subscriber such as capping support or adopt policies that limit competition in a market that has been largely ignored for decades.

Sincerely,


Rae Carole Armstrong
Mayor

City of Plantation
400 NW 73rd Avenue ♦ Plantation, Florida 33317
Telephone: 954.797.2221 ♦ Fax: 954.797.2223
mayorarmstrong@Plantation.org